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Petitioner CHASE HOME FINANCE LLC

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

FRANKI BOLORIN and ROSA RAMOS, Plaintiffs, v. REINER, REINER & BENDETT, P.C., Defendant.	**CASE NO.: 07CV2169 JAH (WMc)** **DECLARATION OF THOMAS E. REARDON IN SUPPORT OF REPLY TO OPPOSITION TO PETITION OF CHASE HOME FINANCE LLC TO QUASH DEPOSITION SUBPOENA DUCES TECUM** Date: January 28, 2008 Time: 11:00 a.m. Ctrom: “C”
CHASE HOME FINANCE, LLC, a Delaware limited liability company Petitioner, v. FRANKI BOLORIN and ROSA RAMOS, Respondents.	

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ADORNO YOSS ALVARADO & SMITH
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SANTA ANA

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DECLARATION OF THOMAS E. REARDON

I, Thomas E. Reardon, declare as follows:

1. I am an assistant vice president with Chase Home Finance LLC ("Chase"). I am duly authorized by Chase to make this declaration on its behalf.

2. As Assistant Vice President, I monitor and oversee loans and/or properties that have resulted in litigation. The business records relating to any loans made by or properties purchased by Chase are within my custody and control and maintained under my supervision and direction. All loan documents relating to the subject construction loan are within my custody and control and maintained under my supervision and direction. Those documents contain entries made in the ordinary course of business at or about the time of the events reflected therein occurred. Specifically, the documents concerning loan number xxx55605 (the mortgage loan made to Franki Bolorin and Rosa Ramos) are now within my custody and control and maintained under my supervision and direction. Those documents contain entries made in the ordinary course of business at or about the time of the events reflected therein occurred.

3. I submit this Declaration in support of Chase's Reply in response to the opposition to petition to quash deposition subpoena duces tecum ("Opposition") of plaintiffs/respondents Franki Bolorin ("Bolorin") and Rosa Ramos ("Ramos" and collectively, "Plaintiffs" or "Respondents").

4. Chase is the servicer of a mortgage loan that was made to Respondents. Deutsche Bank National Trust Company ("Deutsche Bank") is the current holder of the loan, and Chase is the servicing agent and the attorney-in-fact for Deutsche Bank in connection with the loan made to Respondents.

5. Chase, as the attorney-in-fact for Deutsche Bank, retained the law firm of Reiner, Reiner & Bendett ("Reiner Firm") to commence foreclosure against Respondents' residential property in Connecticut. Therefore, the Reiner Firm was retained as Chase's foreclosure attorneys. Therefore, any communications between Chase and the Reiner Firm should be considered attorney-client communications, and Chase does not consent to production of any documents reflecting communications between Chase and the Reiner Firm, including but not limited to any retainer agreement, legal invoices, and/or written correspondences.

6. Moreover, the June 7, 2007 letter from Chase to Respondents, attached as Exhibit "A" to the Opposition, is a form letter. The purpose of the June 7th letter is to inform the borrowers that a subpoena relating to their mortgage loan has been received by Chase, and that Chase needs to respond to the subpoena. The purpose of the letter is to provide an opportunity for the borrowers to object to the subpoena. The letter does not mean and should not be interpreted to mean that Chase agreed to produce the documents requested in the subpoena.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 18 day of January, 2008 at Columbus, Ohio.

THOMAS E. REARDON

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